

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)</b>

**PLAINTIFFS' NOTICE OF *DAUBERT* MOTION TO PRECLUDE  
OPINIONS OF DEFENSE EXPERT AKHILESH NAGAICH, PH.D.**

**TO:** Jessica Davidson, Esq,  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
One Manhattan West  
New York, New York 10001  
*Attorneys for Defendants*

**PLEASE TAKE NOTICE** that pursuant to MDL Text Order 2271, Plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4<sup>th</sup> and Cooper Streets, Camden, New Jersey, for an Order Precluding the Opinions of Defense Expert Akhilesh Nagaich, PH.d.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs shall rely upon the Brief and Certification of Daniel A. Nigh in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

**NIGH GOLDENBERG RASO & VAUGHN,  
PLLC**  
Attorneys for Plaintiffs

By: /s/ Daniel A. Nigh

Dated: March 13, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2023, I electronically filed a partially redacted version of the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. In addition, I hereby certify that unredacted copies of foregoing document will be served contemporaneous to filing via email on the Court, Special Master, and the Defense Executive Committee at [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com).

**NIGH GOLDENBERG RASO & VAUGHN,  
PLLC**

Attorneys for Plaintiffs

By: /s/ Daniel A. Nigh

Dated: March 13, 2023